

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Roberto Carlos ZAMORA

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Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 25, 2021 in the county of Webb in the

Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 United States Code,
Section 922 (g)(1)

Possession of a Firearm by a Prohibited Person (convicted of a crime punishable by imprisonment for a term exceeding one year)

Title 18 United States Code,
Section 922 (g)(5)(A)

Possession of a Firearm by a Prohibited Person (an alien illegally and unlawfully in the United States)

This criminal complaint is based on these facts:

See Attached Sheet...

☒ Continued on the attached sheet.

/s/ Darren Johnson

Complainant's signature

Darren Johnson, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/30/2021

Judge's signature

City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A
(Roberto Carlos Zamora)

On September 1, 2006, Roberto Carlos ZAMORA (ZAMORA) was sentenced to serve two years, probated for three years, by the 341st District Court in Webb County, Texas for the crime of Possession of a Prohibited Weapon, a Third-Degree Felony under the Texas Penal Code, in Cause No. 2006-CRP-000-427-D3.

The United States Border Patrol (USBP) had provided information to ATF that ZAMORA is an undocumented Mexican national or citizen unlawfully present in the United States and has been previously deported or removed from the United States at least once.

On August 25, 2021, while conducting surveillance at a residence at the 11000 block of Sierra Gorda Dr, in Laredo, Texas (hereinafter SIERRA GORDA), ATF agents observed Roberto Carlos ZAMORA (hereinafter ZAMORA) arrive riding a motorcycle (hereinafter MC#1), followed shortly thereafter by JOSE GERARDO AMARO (AMARO) driving a white in color Chevrolet pick-up truck with Tamaulipas, Mexico license plates. AMARO reversed the truck into the residence's driveway.

At some point shortly thereafter, JESUS GUADALUPE COVARRUBIAS, AMARO, ZAMORA, and SANCHEZ walked back and forth between the open garage and the truck. After a short time, AMARO drove the truck away, followed by ZAMORA riding MC#1, COVARRUBIAS riding another motorcycle, and SANCHEZ follow in a blue in color Mercedes. ZAMORA, COVARRUBIAS, AMARO arrived at a residence located on the 1100 block of Quail Hollow Loop (hereinafter QUAIL HOLLOW) in the same vehicles they left the SIERRA GORDA address. ATF agents then observed AMARO take two rifles and a rifle in a black rifle case from the white pickup truck and place them into a safe located inside a garage at the QUAIL HOLLOW address. The two rifles and rifle in a black rifle case were later identified as:

- SIG SAUER, M400 Snakebite, 5.56 NATO rifle, bearing serial number 20L129963.
- ZRODELTA, Range Ready, .223 caliber rifle, bearing serial number ZAR04218.
- OCCAM DEFENSE, ODS-1775, 7.62x39 caliber rifle, bearing serial number OD-00069.

ATF agents detained ZAMORA, COVARRUBIAS, AMARO and received written consent to search the safe and identify the aforementioned firearms from AMARO. After advisement of rights and waiver AMARO told agents that the three firearms were transported from SIERRA GORDA.

ATF agents interviewed ZAMORA at the ATF Laredo Field Office. After advisement of rights and waiver, ZAMORA admitted to being a previously convicted felon and an undocumented

alien unlawfully present in the United States. ZAMORA also admitted that while at the SIERRA GORDA address, he moved the three firearms from the garage to the truck AMARO was driving to help move them to the QUAIL HOLLOW address.

Preliminary examination of the three rifles mentioned above, resulted in a determination that all three firearms were manufactured outside the state of Texas and therefore affected interstate commerce.

Four additional persons were also arrested on firearm charges stemming from the investigation on whom criminal complaints are being contemporaneously filed:

Jose Gerardo Amaro
Jesus Guadalupe Covarrubias
Alejandro Sanchez
Felipe Jesus Melendez-Bravo

